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Attorney for Josh Hall

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,
Plaintiff,
vs.
JOSH HALL,
Defendant

CR 10-229-BR

DECLARATION OF DANIEL FEINER

I, Daniel Feiner, under penalty of perjury, do declare:

1. I am the attorney on the above-captioned case.
2. Mr. Hall is charged with three counts of Bank Fraud and three counts of making false statements to a bank.
3. Trial is presently set for November 16, 2010.

4. Defense investigation is not complete and will not be completed in time for the current trial date.
 5. Negotiations with the government are in progress but will not be completed prior to the current trial setting.
 6. I have communicated with AUSA Michelle Kerin concerning postponement of trial in this matter. She has no objection to a reset until March 8, 2011. Thomas Coan, attorney for co-defendant David Van Beenen has filed a motion seeking a similar postponement and has no opposition to this request.
 7. I have discussed rescheduling trial with Mr. Hall and he told me he agrees with it.
- DATED this 21st day of October, 2010.

/s/ Daniel Feiner
Daniel Feiner, OSB #81221
Attorney for Josh Hall